

Exhibit B
Defendants' Redline to Plaintiffs' Pre-Trial Schedule

1. Monday, October 23rd (adjusted from initial proposal due to document production and protective order delays required by Defendants' actions) –
 - Plaintiffs to serve Requests for Production and Interrogatories on Defendants, incorporating the “voluntary” requests previously identified.
 - Plaintiffs identify available options for facility site visit locations (i.e., options for two visits – one to a “compliant” and the other to a “non-compliant” facility – that are geographically proximate).
 2. Tuesday, October 24th – Plaintiffs file Partial Motion for Summary Judgment.
 3. October 25th – Plaintiffs respond to remaining discovery requests (RFPs and Interrogatories); includes document production, not only service of objections and responses~~October 25th (as adjusted for date only) – Defendants to voluntarily produce the following documents:~~
 - ~~• Written comments provided to both the MA Dept. of Agriculture and MA Attorney General's Office during their respective rule-making processes concerning the Act.~~
 - ~~• Written comments, written or verbal testimony, or other submissions in support or opposition to the Act from the time the petition for ballot initiative was submitted in 2015 until the time of the election in November 2016.~~
 - ~~• Any notes, transcript and/or recordings for any Committee or Joint Committee meeting held concerning Question 3 on or about February 11, 2016.~~

~~Any additional exhibits Defendants intend to offer for exhibits not otherwise produced, subject to objections.~~
 4. Friday, November 3rd – Defendants file opposition to Partial Motion for Summary Judgment.
 5. Monday, November 6th
 - Hearing on Plaintiffs' Motion for Partial Summary Judgment (or another date convenient to the Court).
 6. Weeks of October 30th and/or November 6th
 - Defendants' expert visits Plaintiff facility(ies), subject to appropriate details consistent with the company policy for anyone entering and biosecurity protections, etc. Plaintiffs reserve all rights to assert necessary objections until such information is provided.
 - Defendants conduct depositions of Plaintiffs' fact witnesses/Rule 30(b)(6) witnesses.
 - ~~6.7. Friday, November 10th~~
 - ~~• November 10th (as adjusted) – Defendants to respond to Plaintiffs' discovery requests, including the remaining document production not covered by the above mentioned documents produced voluntarily, not only service of objections and responses.~~
 - Expert reports/declarations exchanged.
- ~~October 25th – Plaintiffs respond to remaining discovery requests (RFPs and Interrogatories); includes document production to be conducted on a rolling basis and anticipated to be completed on or before November 3, not only service of objections and responses.~~
8. ~~Week of October 23rd or 30th –~~
 - ~~• Defendants' expert visits Plaintiff facility(ies), subject to appropriate details consistent with the company policy for anyone entering and biosecurity protections, etc. Plaintiffs reserve all rights to assert necessary objections until such information is provided. In addition, Plaintiffs~~

~~request the right to have their expert(s) conduct visits of Defendants' designated in-state witnesses' farms.~~

~~9.8. November 8th~~ — Final expert reports/declarations exchanged, with all information provided in accordance with the Federal Rules.

~~10.9.~~ Week of November 13th – Defendants conduct depositions of Plaintiffs' expert witnesses.

~~11.10.~~ Friday, November 17th ~~(as adjusted to include conference for Daubert motions)~~ –

- 9:00 AM ET: Parties to meet and confer concerning whether any or all of the trial may be conducted through a Case Stated procedure in accordance with Judge Young's comments at the pretrial conference. If *Daubert* motions *in limine* are to be filed by any party, such party shall meet and confer on these issues at this time as well.
- 6:00 PM ET: Any motion(s) resulting from the parties' conference concerning a Case Stated procedure to be filed.

~~12.11.~~ Monday, November 17th–20th ~~(as adjusted for Daubert motions in limine)~~ – Any ~~additional~~ exhibits not already ~~identified and~~ exchanged between the Parties shall be exchanged ~~between the Parties~~. Supplemented Exhibit Lists ~~shall be~~ filed with the Court. Parties ~~shall also~~ identify any witnesses whose testimony they may offer during trial, whether by affidavit, deposition, or oral testimony. *Daubert* motions *in limine* ~~shall be~~ filed by this date, if any.

~~13.12.~~ Monday, November 27th ~~(as adjusted for Daubert opposition briefing)~~ – Pre-trial briefs and all remaining motions *in limine*, if any, filed. Oppositions to *Daubert* motions *in limine* shall be filed ~~as of this date, too. This shall also include providing w~~ Written objections to proposed exhibits provided.

~~14.13.~~ Wednesday, November 29th – ~~Final Joint Pre Trial Memorandum and o~~ Oppositions to remaining motions *in limine*, if any, filed.

~~15.14.~~ Thursday, November 30th - Parties ~~shall~~ advise the judicial officer and all other parties of their intent to use the testimony of a witness on a specified day.

~~16.15.~~ Monday, December 4th – Trial begins.